

### **REMARKS**

Claims 1-26 are presently pending. Claims 1, 9, 11, 14, 21, 22, and 24 are amended. Claims 1 and 14 are amended to recite "analyzing time and date stamp of a record in the source database to determine if the record has been changed as a result of a change of position of a lot from a first equipment to a second equipment." Claim 22 is amended to recite "determining means for determining if a record in the source database has been changed as a result of a change of position of a lot from a first equipment to a second equipment." Claims 11 and 21 are amended to recite "wherein the determining step comprises analyzing time and date stamp of the record in said source database." These features are supported at least in paragraph 17 of the current specification. No new matter is added as a result of the above amendments. Reconsideration of claims 1-26 is respectfully requested in light of the above amendments and the following remarks.

#### **Objection to Claim 21**

Claim 21 is objected to because of informalities. By this response, claim 21 is amended to depend on claim 14 instead of claim 15. Accordingly, Applicants respectfully request the withdrawal of objection to claim 21.

#### **Rejection under 35 U.S.C. §112, Second Paragraph, Claims 1-26**

Claims 1-26 are rejected under 35 U.S.C. §112, Second Paragraph for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention.

Regarding claims 1, 11, 14, and 24, the Examiner suggests rewording the limitation "analyzing time and date stamp of a record in the source database to determine if the record has been changed based on a change of position of a lot from a first equipment to a second equipment." In particular, the Examiner states that the limitation does not parse grammatically. By this Response, claims 1 and 14 are amended to replace the term "based on" with "as a result of" to clarify that the record in the source database is changed as a result of a change of position

of a lot from a first equipment to a second equipment. Thus, the grammatical error has been corrected.

In addition, the examiner states that since no "base case" has been defined for the source database and no steps are recited for "changing" the database, it is impossible for the claimed invention to ever determine that a record has been modified. Applicants respectfully disagree. Claims 1 and 14 recite an analyzing step that analyzes the time and date stamp of a record in the source database to determine if the record has been changed. Therefore, the limitation provides a step for determining if a record in the source database has been changed by analyzing the time and date stamp of the record itself. The Examiner's allegation is erroneous in that based on the amendments made in claims 1 and 14, no "changing" step is necessary to determine whether a record has been changed in the source database. Instead, the analyzing step as recited in claim 1 is sufficient in determining if a record has been changed in the source database. Therefore, Applicants respectfully submit that it is possible for the claimed invention to determine if a record has been changed without a "changing" step.

Furthermore, the examiner states that databases do not have inherently have time and date stamps. By this Response, claims 1, 11, 14, and 24 are amended to recite "analyzing time and date stamp of the record in the source database" to clarify that the time and date stamp are associated with a record in the source database.

Accordingly, Applicants respectfully request the withdrawal of the rejection to claims 1-26 under 35 U.S.C. §112, Second Paragraph.

#### **Rejection under 35 U.S.C. §101, Claims 1-26**

Claims 1-26 are rejected under 35 U.S.C. §101 because the claimed invention is inoperative and lacks utility. As discussed above in arguments presented for 35 U.S.C. §112, Second Paragraph, the grammatical error has been corrected and that no "changing" step is necessary for the claimed invention to determine if a record has been changed in the source database. Instead, the amendments of claims 1 and 14 clarify the fact that by analyzing time and date stamp of the record in the source database, the claimed invention may determine if the record has been changed. Therefore, Applicants respectfully request the withdrawal of rejection

to claims 1-26 under 35 U.S.C. §101 based on the arguments presented for the rejection under 35 U.S.C. §112, Second Paragraph.

**Rejections under 35 U.S.C. §102(b), Claims 1-26**

Claims 1-26 are rejected under 35 U.S.C. §102(b) as being anticipated by newly cited reference to Burney (US Patent No. 4,829,445). This rejection is respectfully traversed.

The Examiner alleges that Burney discloses the feature of “analyzing time and date stamp of a record in the source database to determine if the record has been changed as a result of a change of position of a lot from a first equipment to a second equipment” at column 53, lines 52-57 and at column 16, step 10, which read as follows:

The Clock/Calendar is a procedure that either sets or returns the current date and time. It takes as arguments an op-code that defines whether to set or return the date and time and, if the op-code is to set time, the new values for date and time in the form of six integers. It returns the current date and time in the same form.

Column 53, lines 52-57.

The distributed routing unit (DRU) 16 informs the host 10 that its task has been completed by sending the host 10 the DRU's History List.

Column 16, step 10.

In the first section, Burney discloses a procedure that sets or returns current date and time. However, Burney does not disclose that the date and time belongs to a record in the source database. To the contrary, the Clock/Calendar procedure is part of the Carrier Controller and SECS Controller procedure as shown in Fig. 11 and Fig. 12. At column 31, lines 38-45, Burney discloses that “the DRU SECS Controller module converts all communications to and from the DRU 16 to the appropriate format. The DRU Carrier Controller module manages material carrier movement on the conveyor network within the DRU's domain.” Thus, neither the SECS Controller nor the Carrier Controller, which contains the Clock/Calendar procedure, has anything to do with a database. Burney is merely concerned with software procedures that are executed within a distributed routing unit (DRU) which, as shown in Fig. 6, is a hardware configuration for moving material carriers. Therefore, the Clock/Calendar procedure of Burney does not analyze the time and date stamp of a record in a source database, as recited in claim 1. In the

second section, Burney merely discloses that after completing its tasks, the DRU sends the host its History List, which identifies each task that is carried out by the DRU (column 20, lines 20-45). Nowhere in the reference does Burney disclose or suggest a record in a source database, let alone analyzing the time and date stamp of the record in the source database. Therefore, Burney does not disclose all of the limitations of claim 1.

In addition, Burney does not disclose “in response to a determination that the record has been changed, locating the record based on an identifier of the lot.” The Examiner alleges that Burney discloses these features at column 16, step 10, which is reproduced above. However, in the above section, there is no mention of a lot or a lot identifier, let alone locating a record that has been changed based on a lot identifier. Burney merely discloses sending the host a whole History List that comprises all the tasks that the DRU completes. Therefore, Burney does not disclose all of the limitations of claim 1.

Furthermore, Burney does not disclose “deleting the record from a target table of the first equipment in the target database.” The Examiner alleges that Burney discloses these features at column 16, step 11, which reads as follows:

The host acknowledges the completion of the task and deletes the entry from the DRU's History List.

However, as discussed above, the DRU's History List merely comprises all the tasks that the DRU completes. The History List is not a target table of the first equipment in the target database. In fact, there is no mention of a table or a database in Burney, let alone deleting a record that has been changed from a target table of a first equipment in a target database. In addition, the deleted entry corresponds to a task completion by the DRU. The deleted entry does not correspond to a record that has been changed in the source database. Therefore, Burney does not disclose all of the limitations of claim 1.

Moreover, Burney does not disclose “inserting the record into a target table of the second equipment in the target database.” The Examiner alleges that Burney discloses these features at column 16, step 3, which reads as follows:

The host gives each DRU 16 along the carrier path (Routing DRUs) tasks, using SECS stream 127 list modifications, to “hand off” the material carrier 56

from Routing DRU to Routing DRU until the material carrier 56 arrives at the Destination DRU.

In the above section, Burney merely discloses how each DRU completes the tasks by handing off material carrier to another DRU until the carrier arrives at the Destination DRU. There is no mention of a table or a database in Burney, let alone inserting a record that has been changed into a target table of a second equipment in a target database. Therefore, Burney does not disclose all of the limitations of claim 1.

By virtue of their dependencies on claims 1, 9, 14, and 22, Burney also does not disclose the features of claims 2-8, 10-12, 21, 23-25. Therefore, the rejection to claims 1, 8-12, 14, and 21-25 is not supported by the Burney reference and should be withdrawn.

In addition, Burney does not disclose the specific features of dependent claims 2-8, 10-12, 21, 23-25. For example, with regard to claims 6 and 19, Burney does not disclose "wherein the source database comprises a source table of the first equipment and a source table of the second equipment." The Examiner alleges that Burney discloses these features at column 34, lines 22-34, where Burney discloses three data structures that are included in the DRU program. However, these data structures are associated with a single DRU. The data structures do not comprise a source table of a first DRU and a source table of a second DRU. This is because Burney is only interested in the data structures of each DRU, not a database that comprises data structures of multiple DRUs. Therefore, Burney also does not disclose the specific features of claims 6 and 19.

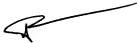
Accordingly, Applicants respectfully request the withdrawal of rejection to claims 1-26 under 35 U.S.C. §102(b).

**Conclusion**

The entry of this amendment is respectfully requested in order to place the claims in condition for appeal. It is clear from all of the foregoing that independent claims 1, 9, 14, and 22 are in condition for allowance. Dependent claims 2-8, 10-13, 15-21, and 23-26 depend from and further limit independent claims 1, 9, 14, and 22 and therefore are allowable as well.

An early formal notice of allowance of claims 1-26 is requested.

Respectfully submitted,



Wing Y Mok  
Registration No. 56,237

Dated: November 3, 2006

HAYNES AND BOONE, LLP  
901 Main Street, Suite 3100  
Dallas, Texas 75202-3789  
Telephone: 972/739-8626  
Facsimile: 214/200-0853  
Docket No.:  
2001-1542 / 24061.440  
R-149266

